

REMARKS

This Application has been carefully reviewed in light of the Final Office Action mailed August 10, 2005. Applicants appreciate the Examiner's consideration of the Application. Claims 1, 14-17, 26, 30, 44, and 46 have been amended. Certain amendments do not narrow the scope of the claims, and certain amendments are not required for patentability. Applicants respectfully submit that no new matter has been added by the amendments to the claims. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

Section 103 Rejection

The Examiner rejects Claims 1-50 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,535,518 to Hu et al. ("*Hu*") and U.S. Patent No. 6,894,979 to Lee et al. ("*Lee*"). Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that the combination of *Hu* and *Lee* proposed by the Examiner fails to disclose, teach, or suggest, the elements specifically recited in Applicants' amended claims. For example, the *Hu-Lee* combination fails to disclose, teach, or suggest the elements specifically recited Claim 1, as amended:

- an application specific integrated circuit configured to:
 - determine that an incoming packet requires protocol conversion; and
 - send at least a portion of the incoming packet to a network processing unit in response to the determination; and
- the network processing unit configured to:
 - identify a first communication protocol of ~~an~~ the incoming packet, the incoming packet destined for a destination port associated with a second communication protocol;
 - determine if the first communication protocol matches the second communication protocol;
 - determine if the first communication protocol and the second communication protocol have a common layer if the first communication protocol does not match the second communication protocol; and
 - encapsulate the incoming packet in the second communication protocol if the first communication protocol and the second communication protocol have a common layer.

First, *Hu* fails to disclose, teach, or suggest the elements. The Examiner states that *Hu* does not expressly show the details of protocol conversion. (Final Office Action, page 2.) Accordingly, *Hu* does not disclose, teach, or suggest an application specific integrated circuit configured to “determine that an incoming packet requires protocol conversion” and “send at least a portion of the incoming packet to a network processing unit in response to the determination,” and a network processing unit configured to perform the protocol conversion as recited in Claim 1.

Second, *Lee* fails to disclose, teach, or suggest the elements. *Lee* discloses automated testing of multiple-protocol network environments. (Abstract.) According to *Lee*:

FIG. 4 depicts the server 10, router 12 and hub 14 of the system illustrated in FIG. 1. These components are illustrated to depict the conversion of data originally transmitted by server 10 according to protocol 1 into a format which is consistent with protocol 2 so that the data can be received by hub 14. This conversion is performed by router 12.

(Column 5, lines 6-11.) *Lee*, however, does not disclose the components of the router and how the components perform the protocol conversion. Thus, *Lee*, however, does not disclose whether circuits perform the protocol conversion. Accordingly, *Lee*, even when combined with *Hu* as proposed by the Examiner, does not disclose, teach, or suggest an application specific integrated circuit configured to “determine that an incoming packet requires protocol conversion” and “send at least a portion of the incoming packet to a network processing unit in response to the determination,” and a network processing unit configured to perform the protocol conversion as recited in Claim 1.

The dependent claims are allowable based on their dependence on the independent claim, and further because they recite numerous additional patentable distinctions over the references of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claim over the references of the rejection, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

For at least similar reasons, Applicants respectfully request reconsideration and allowance of independent Claims 14-17, 26, 30, 44, and 46 and all claims that depend on these claims.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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